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6 IN THE UNITED STATES DISTRICT COURT
7 FOR THE WESTERN DISTRICT OF WASHINGTON
8 AT SEATTLE

9 RUI MAO, QINGBIN BU, RUI FAN,
10 ZHEN FAN, JIANGANG HAN, BING
11 HUANG, WENLAN HUANG,
12 SHUANGYAN JIA, TIEYIN LI, HUAIJIN
13 LIU, ZHONGFA LIU, XINYUAN MU,
14 ZHICUI SHAN, YAO SONG, HAILAN
15 TANG, PEILIN WU, HAITAO XU,
16 XIUQIN YANG, ZHAOHUI YE,
17 JUNHONG ZHANG, ZHONGMEI ZHAO,
18 DIANYI ZHOU, JIAYIN ZHU, XIAOYU
19 ZHU,

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21 Plaintiffs,

22 v.

23 U.S. BANK NATIONAL ASSOCIATION;
24 QUARTZBURG GOLD, LP; ISR
25 CAPITAL, LLC; IDAHO STATE
26 REGIONAL CENTER, LLC; and SIMA
27 MUROFF,

Defendants.

NO. 2:16-cv-01113-TSZ

NOTICE OF RELATED CASES

TO THE ABOVE-ENTITLED COURT:

PLEASE TAKE NOTICE THAT, pursuant to Rule 3(f) of the Local Civil Rules of the Western District of Washington, Defendant U.S. Bank National Association (“U.S. Bank”) hereby gives notice that the following two related cases have been filed in this Court:

Case Name	Case No.	Assigned Judge	Date Filed
<i>Chen et al. v. U.S. Bank National Association et al.</i>	No. 2:16-cv-01109-RSM	Judge Martinez	July 19, 2016
<i>Mao et al. v. U.S. Bank National Association et al.</i>	No. 2:16-cv-01113-TSZ	Judge Zilly	July 19, 2016

These two substantively identical actions are both brought by a group of Chinese citizens against U.S. Bank; Quartzburg Gold, LP; ISR Capital, LLC; Idaho State Regional Center, LLC; and Sima Muroff. Both matters arise from allegations concerning an escrow agreement relating to investments made by the plaintiffs in Quartzburg Gold, LP, in connection with the EB-5 immigration program. The two complaints at issue are identical, with the exception of the named plaintiffs. The allegations in the two cases are complete duplicates of one another, and in both cases the plaintiffs have asserted the same causes of action based on those allegations.

Under these circumstances, the two actions are indisputably “related” because they “concern substantially the same parties, property, transaction, or event,” and “it appears likely that there will be an unduly burdensome duplication of labor and expense or the potential for conflicting results if the cases are conducted before different judges.” *See* W.D. Wash. LCR 3(f)(2). The cases should be conducted before a single judge. Notably, prior to the cases being transferred to the Western District of Washington, the District of Utah had likewise entered an order reassigning both matters to the same judge because they are related cases.

This Notice of Related Cases is being filed in both of the above-referenced matters.

1 Respectfully submitted this 22nd day of July, 2016.

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3 DORSEY & WHITNEY LLP

4
5 /s/ Peter Ehrlichman

6 /s/ Shawn Larsen-Bright

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15 *Attorneys for Defendant U.S. Bank National*
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CERTIFICATE OF SERVICE

I hereby certify that on this date I caused the foregoing document to be electronically filed with the Clerk of Court using the CM/ECF system which will send notification of the filing to all counsel of record.

DATED this 22nd day of July, 2016.

/s/ Molly Price
Molly Price